



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMORANDUM ENDORSED

March 12, 2024

VIA ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl St.
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3/13/2024

Re: United States v. Kassem Hijazi
21 Cr. 183 (GHW)

Dear Judge Woods:

The Government submits this letter to requests an adjournment of the briefing deadline currently scheduled by the Court for March 22, 2024, and the related hearing currently scheduled by the Court for April 10, 2024 (together, the “Deadlines”) to resolve the petitions filed by third-party petitioners, Youssef Ibrahim Herez and Abamo Electronics, Corp. (collectively, “Abamo”) and Luciana De Araujo and Lu Trading Inc. (collectively, “Lu Trading”). Abamo has asserted an interest in the \$2,068,474.36 in United States currency formerly on deposit at TD Bank in account number 4362213880 held in the name of Abamo Electronics Inc. (the “Abamo Account”) and Lu Trading has asserted an interest in (i) \$57,228.12 in United States currency formerly on deposit at JP Morgan Chase in account number 265285970 held in the name of Lu Trading Inc.; and (ii) \$50,579.56 in United States currency formerly on deposit at Regions Bank in account number 246648208 held in the name of Lu Trading Inc. (the “Lu Trading Accounts”).

Since the Court set the Deadlines, in an effort to pursue a potential settlement the Government has had the opportunity to discuss the Abamo and Lu Trading petitions with counsel for Abamo and Lu Trading. On February 13 and February 22, 2024, Abamo and Lu Trading provided the Government with business records relating to the Abamo Account and Lu Trading Account, which the Government is still in the process of reviewing. In addition, the parties have been conducting good faith settlement negotiations, and are continuing to do so.

In light of the ongoing negotiations, the Government, with the consent of counsel for both Abamo and Lu Trading, respectfully requests a 60-day adjournment of the Deadlines, in order to give the parties additional time to continue their efforts to resolve this ancillary forfeiture proceeding without further litigation.

Respectfully submitted,

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By:

/s/
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Application granted. The briefing deadline is extended to May 21, 2024. The hearing scheduled for April 10, 2024 is adjourned to June 4, 2024 at 10:00 a.m. in Courtroom 12C, 500 Pearl Street, New York, New York 10007. The parties are reminded that if they are able to resolve this ancillary forfeiture proceeding prior to this date, they should inform the Court promptly.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 74.

SO ORDERED.

Dated: March 13, 2024
New York, New York



GREGORY H. WOODS
United States District Judge